

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Judgment Creditor,

v.

BENITO CHINEA,

Judgment Debtor,

and

FIDELITY MANAGEMENT TRUST  
COMPANY,

Third-Party Respondent.

14 CR 240 (DLC)

**NOTICE OF MOTION  
FOR TURNOVER ORDER**

PLEASE TAKE NOTICE that the United States of America, by its attorney, Damian Williams, United States Attorney for the Southern District of New York, with notice to the judgment debtor, BENITO CHINEA, moves before the Honorable Denise L. Cote, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York, pursuant to 18 U.S.C. § 3613, Federal Rule of Civil Procedure 69(a)(1), and N.Y. CPLR § 5225(b), upon the accompanying declaration and memorandum of law, to enter a turnover order directing the respondent, Fidelity Management Trust Company, to liquidate securities as needed to turnover \$20,449.00 to the Clerk of Court to satisfy the outstanding fine.

Dated: New York, New York  
September 25, 2023

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

*Gran Resp.*  
*Damian Williams*  
*10/2/23*

By: /s/ Melissa A. Childs  
MELISSA A. CHILDS  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007